

1 KEVIN V. RYAN (CASBN 118321)  
2 United States Attorney

**FILED**

AUG 10 2006

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

3  
4  
5  
6  
7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11  
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v. •

15 MARCUS SEWELL,

16 Defendant.

CR06-00554 MJJ  
No.

VIOLATIONS: 18 U.S.C. § 1591 - Sex  
Trafficking of Children; 18 U.S.C. §  
2423(a)- Transporting a Minor in Interstate  
Commerce With Intent to Engage in  
Criminal Sexual Activity (2 counts); 18  
U.S.C. §§ 1594(c), 2428(b) - Criminal  
Forfeiture

OAKLAND VENUE

17  
18  
19 INDICTMENT

20 The Grand Jury charges:

21 COUNT ONE: (18 U.S.C. § 1591 - Sex Trafficking of Children)

22 1. On or about and between April 14, 2005, and January 30, 2006, in the Northern District  
23 of California and elsewhere, the defendant,

24 MARCUS SEWELL,

25 did knowingly, and by force, fraud, and coercion, recruit, entice, harbor, transport, provide, and  
26 obtain by any means, an individual, D.B., knowing that D.B. had not attained the age of 18 years  
27 and would be caused to engage in a commercial sex act, and did benefit financially from said  
28 venture, in and affecting interstate commerce, in violation of Title 18, United States Code,

INDICTMENT

1 Section 1591.

2  
3 COUNT TWO: (18 U.S.C. § 2423(a) - Transporting Minor for Purpose of Engaging in  
4 Illegal Sexual Activity)

5 2. On or about and between April 14, 2005, and April 16, 2005, in the Northern District of  
6 California and elsewhere, the defendant,

7 MARCUS SEWELL,

8 did knowingly transport D.B., an individual who had not attained the age of 18 years, in interstate  
9 commerce, namely, between Las Vegas, Nevada, and San Jose, California, with intent that D.B.  
10 engage in prostitution, in violation of Title 18, United States Code, Section 2423(a).

11  
12 COUNT THREE: (18 U.S.C. § 2423(a) - Transporting Minor for Purpose of Engaging in  
13 Illegal Sexual Activity)

14 3. On or about and between May 2006, and June 7, 2006, in the Northern District of  
15 California and elsewhere, the defendant,

16 MARCUS SEWELL,

17 did knowingly transport N.K., an individual who had not attained the age of 18 years, in  
18 interstate commerce, including between Orlando, Florida, and San Jose, California, with intent  
19 that N.K. engage in prostitution, in violation of Title 18, United States Code, Section 2423(a).

20  
21 COUNT FOUR: (18 U.S.C. § 1594(c) - Criminal Forfeiture)

22 4. The allegations of Count One of this Indictment are realleged and incorporated herein.

23 5. As a result of the offenses alleged in Count One above, the defendant,

24 MARCUS SEWELL,

25 shall forfeit to the United States any property, real or personal, constituting or traceable to gross  
26 profits or other proceeds obtained from such offenses, including a 2006 White Lexus GS430,  
27 VIN#JTHBN96SX65013999.

28  
INDICTMENT

1 COUNT FIVE: (18 U.S.C. § 2428(b) - Criminal Forfeiture)

2 6. The allegations of Counts Two through Three of this Indictment are realleged and  
3 incorporated herein.

4 7. As a result of the offenses alleged in Counts Two through Three above, the defendant,  
5  
6 **MARCUS SEWELL,**  
7 shall forfeit to the United States any property, real or personal, constituting or traceable to gross  
8 profits or other proceeds obtained from such offenses, including a 2006 White Lexus GS430,  
9 VIN#JTHBN96SX65013999.


10 DATED:

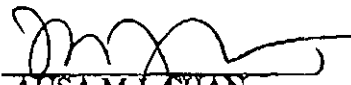
11 AUGUST 10, 2006

A TRUE BILL.

12   
13 FOREPERSON

14 KEVIN V. RYAN  
15 United States Attorney

16   
17 W. DOUGLAS SPRAGUE  
18 Chief, Oakland Branch

19 (Approved as to form:   
20 AUSA M.J. CHAN  
21  
22  
23  
24  
25  
26  
27  
28

INDICTMENT